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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

In re LinkedIn ERISA Litigation

Case No.: 5:20-cv-05704-EJD

**JOINT STATUS REPORT AND
STIPULATED SCHEDULING
REQUEST; ~~PROPOSED~~ ORDER**

Assigned to Hon. Judge Edward J. Davila

JOINT STATUS REPORT & STIPULATED SCHEDULING REQUEST; ~~PROPOSED~~ ORDER

1 Douglas G. Bailey, Jason J. Hayes, and Marianne Robinson (collectively, “Plaintiffs”),
2 and LinkedIn Corporation, the Board of Directors of LinkedIn Corporation, and the 401(k)
3 Committee (collectively, “LinkedIn” and together with Plaintiffs, the “Parties”) by and through
4 their respective counsel, respectfully submit this Joint Status Report and Stipulated Scheduling
5 Request seeking a two (2) week extension of time to file the anticipated motion for preliminary
6 approval of the settlement and all necessary and appropriate supporting papers, such that the
7 deadline to file such papers shall be March 3, 2023. In accordance with Civil L.R. 6-2(a) and 7-
8 12, the Parties state as follows:

9
10 (1) On November 4, 2022, the Parties informed the Court that, following mediation,
11 the Parties have agreed in principle to resolve this litigation. [ECF No. 132.] At the same time,
12 the Parties proposed that Plaintiffs file a motion for preliminary approval of the settlement and
13 all necessary and supporting papers by December 9, 2022 or, if the Parties were not in a position
14 to fully document their settlement or obtain all necessary consents or approvals by such date, file
15 a joint report to apprise the Court of their progress and request additional time. *Id.*

16 (2) On December 9, 2022, the Parties filed a Joint Status Report requesting a four (4)
17 week extension of time to file the anticipated motion for preliminary approval of the settlement
18 and all necessary and appropriate supporting papers. [ECF No. 133.] On December 9, 2022, the
19 Court granted that Joint Request, setting the deadline for the Parties to file for preliminary
20 approval of the settlement on January 20, 2023. [ECF No. 134.]

21 (3) On January 17, 2023, the Parties filed a Joint Status Report requesting a four (4)
22 week extension of time to file the anticipated motion for preliminary approval of the settlement
23 and all necessary and appropriate supporting papers. [ECF No. 135.] On January 17, 2023, the
24 Court granted that Joint Request, setting the deadline for the Parties to file for preliminary
25 approval of the settlement on February 17, 2023. [ECF No. 135.]

(4) While the Parties have continued to work diligently to prepare the necessary papers, they are still working through certain matters related to the Plan of Allocation in light of the merger of the LinkedIn Corporation 401(k) Profit Sharing Plan at issue in this litigation with the Microsoft Corporation Savings Plan. The Parties are cooperating concerning the preparation of the Plan of Allocation and related work necessary to prepare for effectuation of the settlement in light of the plan merger.

(5) The Parties are close to finalizing their agreement and expect this to be the final request for additional time. But the Parties require additional time to fully memorialize the settlement and prepare the appropriate papers to submit to the Court for preliminary approval under Federal Rule of Civil Procedure 23.

(6) The Parties continue to work in good faith to adhere to the Court's scheduling orders. Since the Second Amended Complaint was filed, the Parties have stipulated to an extension of time for Defendants to respond to Plaintiff's Complaint [ECF No. 101], requested a Joint Motion to Stay Proceedings Pending Mediation [ECF No. 124], made a joint Motion for Additional Time to continue to pursue mediation [ECF No. 129], and made two Joint Requests for Additional Time to continue preparing the requisite settlement papers [ECF No. 133; ECF No. 135].

(7) The extension of time would not have any further effect on the schedule for this case.

(8) This request is not made for purpose of delay or any other improper purpose.
IT IS SO STIPULATED.

Dated: February 13, 2023

/s/ Kolin C. Tang
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JOINT STATUS REPORT & STIPULATED SCHEDULING REQUEST; ~~PROPOSED~~ ORDER

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Dated: February 13, 2023

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ATTESTATION PURSUANT TO CIVIL L.R. 5-1(i)

The filer attests that the other signatory listed, Kolin C. Tang, who is the authorized signatory of Plaintiffs, concurs in the filing's content and has authorized the filing.

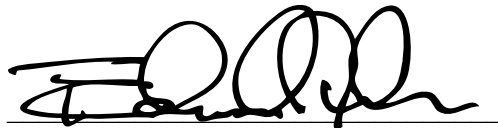
Dated: February 13, 2023

/s/ Sean K. McMahan

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: February 16, 2023



HON. EDWARD J. DAVILA
UNITED STATES DISTRICT JUDGE